



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

GK/MD  
F. #2018R01809

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 20, 2022

By Email and ECF

Murray E. Singer, Esq.  
14 Vanderventer Ave.  
Suite 147  
Port Washington, NY 11050

Re: United States v. Mustafa Goklu  
Criminal Docket No. 19-386 (PKC)

Dear Mr. Singer:

The government provides the following discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which supplements the government's disclosures made on or about September 19, 2019, December 10, 2020, January 19, 2021, July 7, 2021 and January 7, 2022. The government also requests reciprocal discovery from the defendant.

The enclosed supplemental discovery includes:

- Drug Enforcement Administration ("DEA") paperwork and reports, Bates-numbered MG000241 – MG000246;
- Spreadsheets listing serial numbers of U.S. currency the defendant provided to an undercover DEA agent, Bates-numbered MG000247 – MG000252;
- Photographs of U.S. currency the defendant provided to an undercover DEA agent, Bates-numbered MG000253 – MG000256; and
- Signal messages of the defendant, Bates-numbered MG000257 – MG000270.<sup>1</sup>

In addition, the government has identified a subset of photos and Signal application messages contained on a cellular telephone seized from the defendant on or about

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<sup>1</sup> The Signal messages and photographs supplement messages and photographs previously provided by the government on September 19, 2019 at MG000013 – MG000050 and MG000080 – MG000089.

April 20, 2019, previously produced on July 7, 2021 at MG000146 and MG000147, which the government plans to seek the admission of at trial in the above-captioned matter. Those photographs and messages are enclosed for your reference and Bates-numbered MG000271 – MG000696.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

BREON PEACE  
United States Attorney

/s/ Gillian A. Kassner  
Gillian A. Kassner  
Marietou Diouf  
Francisco J. Navarro  
Assistant United States Attorneys  
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Enclosures

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)